

## REMARKS

Reconsideration of the present application is respectfully requested. Claims 1-17, 24 and 30-34 have been amended. No claims have been canceled. No new claims have been added in this response. No new matter has been added.

### Claim Rejections - §101

Claims 1-16 and 30-34 stand rejected under 35 USC §101. Claim 1, as currently amended, recites a limitation of “presenting the animation of the image object on a display of the device”, which creates a concrete, tangible, and useful result. Thus, the §101 rejections to claims 1-16 are believed to be overcome.

Regarding claims 30-34, Applicants amended the claims to recite a “computer-readable storage medium having a plurality of instructions stored therein which, when executed by a processor of a computer, cause the processor to perform a process comprising”. Thus, the rejections to claims 30-34 are believed to be overcome.

### Claim Rejections - §102

Independent claims 1, 17, 24 and 30 stand rejected under 35 USC §102(b) based on Merrill (US Patent 6,369,821). Applicants respectfully traverse the rejections.

In one embodiment, Applicants' invention generally relates to a technique of controlling a remote user interface. A server transmits a motion command to a remote device to update a graphical user interface (GUI) displayed on the remote device. In one embodiment, the motion command directs the remote device to animate an image of the GUI. In response to receiving the motion command, the remote device uses the

image data stored in a local image cache to render the frames of the animation. Thus, the server does not have to render the frames of the animation and send the frames across network to the remote device. With the above remarks in mind, attention is directed to claim 1.

Claim 1, as currently amended, recites:

1. In a device comprising an image cache, a method comprising:  
**receiving, via a network from another device remote to the device, a motion command, wherein the motion command, without including pixel values generated by the another device, directs animation of an image object stored in the image cache over a time period;**  
updating a frame buffer of the device with the image object of the image cache over the time period to animate the image object per the motion command; and  
presenting the animation of the image object on a display of the device.  
**(Emphasis added).**

In contrast, Merrill does not teach or suggest the above emphasized limitation. Merrill discloses an animation server providing animation services to one or more client applications. However, as disclosed in Merrill, the animation server and the one or more client applications are intended to be running on the same computer system. For example, as disclosed in lines 38-46 of column 5, during the animation server's playback of an animation, the animation server relies on graphic support software in the underlying operating system to create windows, post messages for windows, and paint windows. Thus, presumably, the client applications are on the same computer system with the animation server. Otherwise, the disclosed system in Merrill would be inoperable because the animation is not presented to users of the client applications which are running on a different computer system. That the client applications and the animation server are intended to be running on the same computer system is further supported by the disclosure of Figure 11 and the related discussions of Figure 11 in

Merrill. Specifically, as disclosed in lines 19-34 of column 34, the animation server's base code and related data are firstly downloaded to the client computer, on which the web browser is running. The client computer then creates an instance of the animation server based on the downloaded base code. Thus, the animation server is running on the same computer system with the client application, the web browser.

Thus, at least for the above reasons, claim 1 and all claims which depend on it are patentable over Merrill.

Independent claims 17, 24 and 30 each recites limitation similar to that discussed above for claim 1. Particularly, claims 17 and 30 each recites the present invention from the server's perspective. For similar reasons, claims 17, 24, 30 and all claims which depend on them are also patentable over Merrill.

#### Dependent Claims

In view of the above remarks, a specific discussion of the dependent claims is considered to be unnecessary. Therefore, Applicants' silence regarding any dependent claim is not to be interpreted as agreement with, or acquiescence to, the rejection of such claim or as waiving any argument regarding that claim.

In light of the comments above, the Applicant respectfully requests the allowance of all claims.

#### CONCLUSION

Applicant respectfully submits that all rejections have been overcome and that all pending claims are in condition for allowance.

If there are any additional charges, please charge them to our Deposit Account Number 02-2666. If a telephone conference would facilitate the prosecution of this application, the Examiner is invited to contact Michael J. Mallie at (408) 720-8300.

Respectfully Submitted,  
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Date: May 29, 2007

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